

REMARKS

Claim 1 was rejected under 35 U.S.C. § 102(e) as being anticipated by Etzel. It is respectfully submitted that *prima facie* anticipation has not been established with respect to independent claim 1.

Independent claim 1 calls for a reorderer to reorder blocks of an original content item according to a key. However, Etzel encrypts in a conventional manner and does not specify any particular conventional encryption algorithm. *See, e.g.*, column 4, lines 14-17. In contrast, as explained in the specification of the above-referenced application, reordering of original content may optionally be done in conjunction with conventional encryption, but it is not necessary. Specification, page 4, lines 17-21.

Additionally, Etzel does not clearly generating a key according to an identifier value of another apparatus, and reordering blocks of an original content item according to the key. For example, a unique program encryption key that is used by the security module 30 to encrypt information from an encoder is generated beforehand and is known only by the security module 30. Column 2, lines 50-60; column 3, lines 48-65. Etzel is relatively silent with respect to how the unique program encryption *key that is actually used to encrypt the video program* is generated, other than being generated beforehand, and that it is also encrypted. *See, e.g.*, column 1, line 53-column 2, line 8.

Moreover, Etzel apparently sends the encrypted video to a subscriber terminal in a linear fashion. That is, program segments appear to be sequentially transmitted, decrypted, and displayed. Column 7, line 46-column 8, line 4. According to an embodiment of the present invention, the reordered blocks of the content item are stored when the Reorder Structure Generator generates a structure indicating that the blocks of the content item have been reordered and what the correct order is to retrieve the blocks. *See, e.g.*, Figures 3-5. As such, for at least these reasons, it is respectfully submitted that *prima facie* anticipation has not been established for claim 1 or claims dependent thereon.

Under a similar analysis, Etzel does not anticipate amended claim 79 or claim 91 and their respective dependent claims.

Amended claim 56 calls for a storage to store a copy of a client identifier that identifies more than one client, a key generator to generate a reordering key according to the copy of the client identifier, and a device to enable transfer of a content item to the identified clients in a

reordered block format according to the reordering key. It is respectfully submitted that Etzel does not anticipate amended claim 56. For example, the symmetrical key shared between the module 30 and the module 50 is limited to those modules. *See* column 5, lines 35-60.

Additionally, the symmetrical key shared between the module 50 and module 215 is for the particular subscriber module. *See* column 6, lines 6-30. As such, Etzel does not anticipate amended claim 56 and claims dependent thereon.


CONCLUSION

In view of the amendments and remarks herein, the application is believed to be in condition for allowance. The examiner's prompt action in accordance therewith is respectfully requested.

The commissioner is authorized to charge any additional fees, including extension of time fees, or credit any overpayment to Deposit Account No. 20-1504 (ITL.0778US).

Respectfully submitted,

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